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Docket Number 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3071
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Reference: Comments on Docket Number 05-015-01

To Whom It May Concern:

I support the efforts of the United States Department of Agriculture (USDA) to establish and implement the National Animal Identification System (NAIS). I appreciate the need for an animal identification system.

Animal identification is needed to help speed the traceback of animals and to enhance our ability to provide better disease surveillance generally accepted within the cattle industry. I support establishing a system that will trace a diseased animal from the time of the diagnosis through the marketing chain to the herd of origin within 48 hours.

I support the overall objectives of the NAIS. There are a number of issues related to the implementation of the NAIS that remain unresolved. I agree with many of the concerns identified in the Draft Strategic Plan and the Draft Program Standards. These issues and concerns need to be addressed and worked through cooperatively with government, joint leadership of the species and segment working groups and issue-based groups.

This nation has a long history of effective animal health programs being developed and implemented by involvement of all parties at the table and adopting a consensus on how the program should operate. I strongly encourage USDA to continue this long established and successful consensus program development for NAIS. Federal Register notices and request for comments will not contribute to stakeholder

involvement to develop and identification program or system with consensus support from the industries.

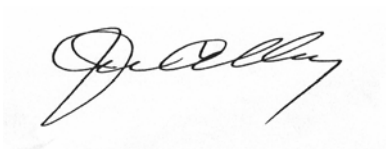
The United States Animal Health Association (USAHA) has a 108 year history of providing this nations forum for development of solutions to animal and public health and food safety issues. USAHA's Committee on Livestock Identification has the broad based stakeholder membership to address and referee this nation's ID concerns. The Draft Program Standards referenced to in this Docket was worked on and approved as a work in progress by the Committee on Livestock Identification during it's meeting in 2004. I believe the committee expects to further refine the Program Standards during it's 2005 meeting.

The eleven specific issues or topics that this Docket solicits feedback on should be addressed by USAHA's Committee on Livestock Identification at it's 2005 meeting with a goal of reaching consensus on each of these issues.

I hope and strongly recommend that USDA use the USAHA Committee structure for development of the NAIS as it has for successful programs for brucellosis, pseudorabies, tuberculosis and others, rather than attempt to do this through the Federal Register.

I appreciate the opportunity to make these comments, and to be a part of the process.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lee Alley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

J. Lee Alley, D.V.M.